

HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

BERNARD ROSS HANSEN, and
DIANE RENEE ERDMANN,

Defendants.

Case No. CR18-0092-RAJ

MOTION TO FILE DECLARATION EX
PARTE AND IN CAMERA

NOTED FOR HEARING:
October 4, 2021

Mr. Hansen respectfully requests leave to submit to the Court for *ex parte, in camera* review a declaration from Angelo J. Calfo that details sensitive attorney work product in preparing Mr. Hansen for sentencing. This declaration provides detail on counsel's work with Mr. Hansen to date and strategy for the sentencing and explains why this ongoing work necessitates a continuance of the sentencing date. Filing this information on the public docket would not only undermine Mr. Hansen's work-product protections, but would also reveal private, confidential, and sensitive information about Mr. Hansen.

Mr. Hansen has conferred with the government which has indicated that it will take no position this motion.

1 DATED this 4th day of October, 2021.

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